

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ALCIRA ORTIZ, AS NATURAL MOTHER AND
LEGAL GUARDIAN OF C.C., A MINOR CHILD,

Plaintiffs,

Case No. 08-CV-2379 (SCR)

- against -

HASBRO, INC., COSTCO, INC., and JOHN
DOES 1-15,

**PROPOSED
BRIEFING SCHEDULE**

Defendants.

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Pursuant to the Individual Rules of the Honorable Stephen C. Robinson, the undersigned counsel for the plaintiffs and counsel for defendants Hasbro, Inc. and Costco, Inc. have conferred regarding said defendant's intention to serve and file a motion pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure with respect to the Complaint's allegations relating to punitive damages. Counsel hereby submit their proposed scheduling order with respect to said motion.

Defendants Hasbro, Inc. and Costco, Inc. will serve and electronically file their notice of motion, affidavit(s) or declaration(s) and memorandum of law in support of their motion by June 16, 2008.

Plaintiffs will serve and electronically file their opposing affidavit(s), declaration(s) and/or answering memorandum of law, if any, by July 14, 2008.

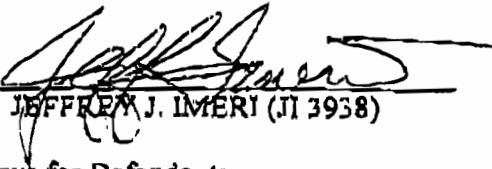
Defendants Hasbro, Inc. and Costco, Inc. will serve and electronically file their reply affidavit(s), declaration(s) and/or reply memorandum of law, if any, by August 4, 2008.

Dated: New York, New York
June 11, 2008

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DOC #:
DATE FILED:

MARSHALL, DENNEHEY, WARNER,
COLEMAN & GOGGIN

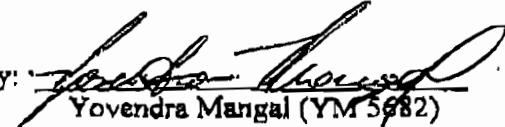
By:


JEFFREY J. IMERI (JI 3938)

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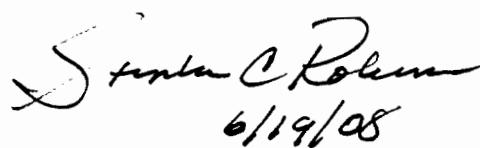
DEL CARMEN & MANGAL, P.C.

By:


Yovendra Mangal (YM 5982)

Attorneys for Plaintiffs
87-87 Francis Lewis Boulevard, 2nd Fl.
Queens Village, NY 11427
(718) 464-4448

SO ORDERED:


S.C.R.

6/19/08

Hon. Stephen C. Robinson, U.S.D.J.